

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

RASUL ROE, *et al.*,

Plaintiffs,

v.

ALEJANDRO N. MAYORKAS, *et al.*,

Defendants.

Civ. Case No. _____

PLAINTIFFS' MOTION TO PROCEED UNDER PSEUDONYM

Plaintiffs hereby respectfully request that this Court GRANT this motion to permit them to proceed under pseudonym in this civil action. Plaintiffs are submitting an accompanying memorandum of law in support of this motion.

Plaintiffs, Afghans and their U.S.-based relatives or close family friends, applied to federal agencies for a form of administrative relief called humanitarian parole, which would allow them to escape the Taliban by temporarily entering the United States for urgent humanitarian reasons. Publicly disclosing Plaintiffs' identities would seriously threaten many of them with grave harm—including torture and death—at the hands of the Taliban. The Court should allow Plaintiffs to proceed using pseudonyms because, among other reasons explained in the supporting memorandum, any interest the public may have in disclosure of the Plaintiffs' identities does not outweigh their compelling interest in anonymity.

Allowed Wm. D.J.
5/27/22